

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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DONALD P. BOLAND and MARY A. : Civil Action No. 1:16-cv-03925-LLS  
BOLAND, Individually and on Behalf of All :  
Others Similarly Situated, : CLASS ACTION  
Plaintiffs, : LEAD PLAINTIFF'S NOTICE OF MOTION  
vs. : AND MOTION FOR FINAL APPROVAL OF  
Settlement and Approval of Plan  
of Allocation  
GERDAU S.A., et al., :  
Defendants. :  
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TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that Lead Plaintiff Policemen's Annuity and Benefit Fund of Chicago, on behalf of the Class, through counsel, will move this Court on October 20, 2017, at 12:00 p.m., before the Honorable Louis L. Stanton, for entry of orders and judgments, pursuant to Rule 23 of the Federal Rules of Civil Procedure: (1) granting final approval of the settlement; and (2) approving the proposed Plan of Allocation. This motion is based on: (i) the Memorandum of Law in Support of Lead Plaintiff's Motion for Final Approval of Settlement and Approval of Plan of Allocation; (ii) the Declaration of Henry Rosen in Support of Lead Plaintiff's Motion for Final Approval of Settlement and Approval of Plan of Allocation and Lead Counsel's Motion for an Award of Attorneys' Fees and Expenses and Award to Lead Plaintiff Pursuant to 15 U.S.C. §78u-4(a)(4); (iii) the Declaration of Carole K. Sylvester; (iv) the Declaration of Lead Plaintiff; (v) the Stipulation of Settlement; and (vi) all other proceedings herein.

Proposed orders will be submitted with Lead Plaintiff's reply submission on or before October 13, 2017.

DATED: September 22, 2017

Respectfully submitted,

s/ Ellen Gusikoff Stewart

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Lead Counsel for Plaintiff

**CERTIFICATE OF SERVICE**

I, Ellen Gusikoff Stewart, hereby certify that on September 22, 2017, I caused a true and correct copy of the attached:

Lead Plaintiff's Notice of Motion and Motion for Final Approval of Settlement and Approval of Plan of Allocation

to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such public filings to all counsel registered to receive such notice.

*s/ Ellen Gusikoff Stewart*

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ELLEN GUSIKOFF STEWART